

Message

From: Mustain, Erin@Waterboards [Erin.Mustain@waterboards.ca.gov]
Sent: 4/25/2018 11:14:41 PM
To: WEISS, MICHAEL [weiss.michael@epa.gov]
Subject: FW: Follow-up on major facilities in significant non-compliance - SRF
Attachments: Copy of Enforcement_Actions_with_Linked_Violations_Report 9-28-17.xlsx; Copy of DMR_Deficiency__Violation_Report_v2.6_by_NPDES_ID 9-28-17.xlsx; Copy of FY16_CWA_8A2_CA_state_SNC cases added.xlsx

It looks like Ken did pull that data so maybe Sandra or Elizabeth can show us how to pull that info.

Erin

From: Carrigan, Cris@Waterboards
Sent: Monday, October 2, 2017 3:34 PM
To: Mustain, Erin@Waterboards <Erin.Mustain@waterboards.ca.gov>
Cc: Buffleben, Matthew@Waterboards <Matthew.Buffleben@waterboards.ca.gov>
Subject: FW: Follow-up on major facilities in significant non-compliance - SRF

Hi Erin; this information from Ken Greenberg could be helpful to your work on the SNC list project. Thanks! Cris

From: Greenberg, Ken [mailto:Greenberg.Ken@epa.gov]
Sent: Friday, September 29, 2017 5:29 PM
To: WEISS, MICHAEL <weiss.michael@epa.gov>; Carrigan, Cris@Waterboards <Cris.Carrigan@waterboards.ca.gov>; Buffleben, Matthew@Waterboards <Matthew.Buffleben@waterboards.ca.gov>
Subject: RE: Follow-up on major facilities in significant non-compliance - SRF

Cris and Matt – I wanted to check in on how you're doing on Mike Weiss's inquiry about State enforcement against the FY16 SNC dischargers. I'm also sending some additional data that might help you answer our questions. Again, we want to know:

1. Do you agree that the 34 facilities listed under metric 8A2 are properly listed as being in SNC; and
2. What enforcement did the state take to address the SNC violations?

We pulled some data from ICIS to help answer these questions:

- An ICIS data pull of enforcement actions from October 2015 to present against any of the 34 SNC facilities.
- An ICIS data pull of effluent limit and reporting violations at the 34 SNC facilities.

Finally, in the spreadsheet for data element 8A2, we listed any enforcement actions we found in ICIS in columns N and O. According to ICIS, California took one or more enforcement actions against 16 of the 34 SNC facilities. Do these enforcement actions adequately address the SNC violations? Also, please let us know if there were any other State enforcement actions that we did not see in ICIS. We are particularly interested to know if there was State enforcement against any of the 18 SNC facilities where we found no enforcement in ICIS. We realize that some of the SNC violations may have started prior to FY16 and that there may have been State enforcement action taken prior to FY16 that would have escaped our ICIS data search which was limited to enforcement from October 2015 to present.

Thanks for your help. Call me or Mike if you have any questions about this.

Ken Greenberg, Manager
Wastewater Section (ENF-3-1)
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From: WEISS, MICHAEL

Sent: Monday, September 11, 2017 3:26 PM

To: Cris.Carrigan@waterboards.ca.gov; Buffleben, Matthew@Waterboards <Matthew.Buffleben@waterboards.ca.gov>

Cc: Greenberg, Ken <Greenberg.Ken@epa.gov>

Subject: Follow-up on major facilities in significant non-compliance - SRF

Hi Cris and Matt,

As part of the State Review Framework for Federal FY16, I have to review how the Regional Boards took action against facilities in Significant Noncompliance. I am sure you are very aware of the many issues with finding out this information and my manager, Ken Greenberg, recommended I reach out to you. Attached is a spreadsheet of the facilities listed in SNC for Sept 2015-Oct 2016. Please verify for accuracy. Unfortunately the Regional Board and the action taken by the RB were not available to be included in the query. Any help you could provide in filling in the missing columns for the spreadsheet would be much appreciated. Please let me know if you have any additional questions.

Thank you,

Mike

Michael Weiss
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